

Appl. No. 09/695,155  
Atty. Docket No. 8284  
Amdt. dated December 16, 2003  
Reply to Office Action of September 16, 2003  
Customer No. 27752

### REMARKS

Applicants' attorney would like to thank the Examiner for her courteousness during the brief telephone conversation she had with Applicants' attorney on December 15, 2003. The Examiner's remarks were helpful and very much appreciated.

Claims 1-26 are pending in the present application. Of these claims, claims 19-26 have been withdrawn from consideration in response to a restriction requirement, and thus, Claims 1-18 are being examined.

Claims 1, 11, 16 and 17 have been amended to add the limitations that the mask be flexible and comprise a flexible film. Support for the amendment relating to the mask comprising a film can be found, for example, at page 51, lines 5-7 of the specification and throughout the specification and figures (e.g. Figures 19-25a). Support for the amendment relating to the flexible nature of the mask can be found, for example, at page 51, lines 5-7, page 52, line 25 through page 53, line 2 and throughout the specification and figures (e.g. Figures 19 and 50-52).

Applicants' attorney believes that the amendments do not involve any introduction of new matter. Consequently, entry of these amendments is believed to be in order and is respectfully requested.

### Rejection Under 35 USC 102 Over U.S. 5,500,277 issued to Trokhan et al.

The Examiner rejected Claims 1-5, 8-16 and 18 under 35 USC 102(b) over the Trokhan '277 reference basically stating that the reference related to an endless belt had all of the features of the rejected claims. Applicants' attorney respectfully traverses the rejection and asks that it be reconsidered in light of the amendments to the claims and withdrawn.

The Trokhan '277 reference is directed generally to a belt for making through-air-dried cellulosic fibrous structures. The belt, as described in the Trokhan '277 reference includes two primary elements, a reinforcing structure 12 and a pattern layer 30 (col. 5, lines 16-18). The layers of the reinforcing structure 12 are comprised of interwoven yarns (col. 5, lines 20-25 and Figs. 1-3). The pattern layer 30 is cast from a resin onto the reinforcing layers (col. 5, lines 31-33). Together, the reinforcing structure and the pattern layer form a belt 10 that is used in papermaking. Specifically, the belt is described as being useful for carrying a web of cellulosic fibers from a forming wire to a drying apparatus (col. 5, lines 12-14). Further, as noted in the specification of the Trokhan '277 reference, it is desirable that the entire reinforcing structure

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have an open area to provide a path for air and/or water to flow through the belt (col. 8, lines 47 – col. 9, lines 20 and last clause of independent claims 1-3).

In contrast, the claimed mask of the present invention comprises a continuous flexible film. The purpose of the mask is to allow for differential curing of a photosensitive material that is disposed between the mask and another member, such as the reinforcing member of the Trokhan '277 reference (see, e.g. Figs. 19, 50 and 51 as well as the description of how the deflection member is made and how the mask is used, e.g. at pages 45-51 of the present application). Thus, it is important that the mask be continuous (e.g. non-apertured) such that the photosensitive material does not leak through the mask during the curing process (example of continuous film mask materials are shown in the Figures, e.g. Figures 20-25a). Accordingly, the mask of the present invention comprises a continuous film that is structurally very different from the belt disclosed in the Trokhan '277 reference.

Accordingly, Applicants' attorney respectfully requests that the rejection of Claims 1-5, 8-16 and 18 over the Trokhan '277 reference be reconsidered in light of the amendments made to the claims and that the claims be allowed.

Rejection Under 35 USC 102 Over U.S. 5,914,202 issued to Nguyen et al.

The Examiner rejected Claims 1-5, 8-16 and 18 under 35 USC 102(b) over the Nguyen et al. '202 reference stating that the reference related to a phase shifting reticle for use in making integrated circuits had all of the features of the rejected claims. Applicants' attorney respectfully traverses the rejection and asks that it be reconsidered in light of the amendments to the claims and withdrawn.

As noted in Applicants' previous Response, Applicants' attorney respectfully disagrees with the Examiner that the Nguyen '202 reference should be applicable at all to the present invention because it is not directed to a mask for forming a pattern layer on a papermaking belt, but rather is directed to a reticle for making integrated circuits or the like. However, even if one were to consider the two very different articles to be the same, structurally, they are not. For example, the independent claims of the present application have been amended to include the limitation that the mask be flexible. From reading the Nguyen '202 reference, it appears that the reticles disclosed are not flexible. In fact, the reticles of the Nguyen '202 reference are described as being made of materials such as quartz, synthetic quartz and glass (col. 7, lines 7-10 of the Nguyen '202 reference) which are generally regarded as rigid and not flexible. Thus, the reticles

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described in the Nguyen '202 reference are structurally different from the mask claimed in the present application.

Accordingly, Applicants' attorney respectfully requests that the rejection of Claims 1-5, 8-16 and 18 over the Nguyen et al. '202 reference be reconsidered in light of the amendments made to the claims and that the claims be allowed.

Rejection Under 35 USC 103(a) Over Trokhan '277

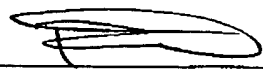
Claims 6, 7, 17 and 18 have been rejected under 35 USC 103(a) as being unpatentable over the Trokhan '277 reference. Applicants respectfully traverse this rejection and requests that it be reconsidered in light of the amendments to the claims and withdrawn.

All of the arguments set forth above with respect to the differences between the claimed invention and the Trokhan '277 reference are repeated here with respect to the claims rejected under 35 USC 103(a). Accordingly, and in lieu of the amendments to the claims, Applicants' attorney believes that the Trokhan '277 reference does not make the rejected claims obvious and thus asks that the Examiner reconsider the rejection and allow the claims.

Conclusion

In light of the above remarks, it is requested that the Examiner reconsider and withdraw the rejections under 35 USC 102(b) and 35 USC 103. Applicants have made an earnest effort to place their application in proper form and to distinguish the invention as now claimed from the applied references. In view of the foregoing, Applicants' attorney respectfully requests reconsideration of this application, entry of the amendments presented herein, and allowance of Claims 1-18.

Respectfully submitted,  
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December 15, 2003  
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